



Eastern Ontario Wardens' Caucus

Haliburton  
Renfrew  
Hastings  
Peterborough  
Kawartha Lakes  
Prince Edward  
Frontenac

Lanark  
Leeds & Grenville  
Prescott & Russell  
Stormont Dundas & Glengarry  
Northumberland  
Lennox and Addington

*Acting in Partnership.*

Picton, July 26, 2017

The Honourable Dr. Eric Hoskins  
Minister of Health and Long-Term Care  
10th Floor, Hepburn Block  
80 Grosvenor Street  
Toronto, Ontario M7A 2C4

**Re: *Ambulance Act* Legislative Consultation Including Fire-Medic Proposal**

Dear Minister Hoskins,

Over the past few weeks, the Eastern Ontario Wardens' Caucus (EOWC) has reviewed and discussed the legislative consultation regarding the *Ambulance Act*, including the proposal to enable the Province to pilot firefighter paramedics within Ontario.

Following its own review, and discussions with its partners in the Association of Municipalities of Ontario (AMO) and the Ontario Association of Paramedic Chiefs (OAPC), the EOWC has a number of concerns regarding the proposed changes to the *Act*.

Regarding the firefighter paramedics pilot project, the EOWC agrees with its partners that there is still no evidence available that such pilots would improve patient outcomes; however, municipal labour and risk management issues could be significant.

Furthermore, there has not been any evidence provided to date that would support a decision to move forward with pilots. In addition, all municipal associations have informed the Province that they did not support moving forward with any pilots. Municipal stakeholders have instead identified significant risks, liabilities, and duplication of services.

It is also important to highlight, Minister, this concept has never been requested by municipalities and certainly does not address the key priorities for improvement in paramedic service delivery in Ontario, including the review and overhaul of the provincial land ambulance dispatch system.

The EOWC therefore supports the position of the OAPC in requesting that:

1. The Province not move forward with any pilot that duplicates paramedic services within Ontario.
2. The Province respond to the request by municipal stakeholders to address the number one priority with paramedic services in Ontario – fixing and investing much needed technology and process improvements within the dispatch system.
3. The Province fully examine the changes to the *Ambulance Act* (including any pilots) with a focus on patient risk, quality assurance, and municipality liability/exposure.
4. Prior to any implementation, all affected stakeholders are fully engaged, consulted and that reasonable timelines are put in place to allow for an appropriate system transition (alternative destinations especially).



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Provincial legislation sets the framework for municipal land ambulance services and outlines the manner in which municipal paramedics practice. It is therefore imperative, Minister, that the legislation and regulations support best practice for the patient, while providing municipalities with the powers to balance risk and liability for the paramedic practitioner and the municipality.

Furthermore, like AMO and the OAPC, the EOWC will also continue urging the Province to make immediate improvements to the call triaging and dispatch system, as well as addressing the current non-urgent transfer requirements on an emergency service. Both matters are part of the MOHLTC Phase 2 plan to enhance emergency services in Ontario.

The EOWC therefore requests that any potential modernization changes need to be carefully considered and examined to ensure that any change:

1. Places the patients' needs first;
2. Is clinically supported through evidence based documentation;
3. Is designed in such a way that any and all changes carefully consider the impact to all stakeholders, (e.g., Urgent Care Centres, Walk-in-clinics).

While the proposed changes on their merits appear progressive – and moving in the direction of improving response to the growing demand for service – they could have a substantive negative impact on patient care, if not carefully examined. For example, lower acuity patients may actually require higher level and more detailed assessments, due to the potential for other underlying chronic issues which could impact their presentation and subsequent treatment.

In short, patients are unpredictable; the clinical status of a patient that appears "stable" can fluctuate. With these proposals, such extensive changes to clinical practices related to the assessment and treatment of patients requires cautious planning, preparation and training, and Performance Standards programs to avoid putting patient at risk.

Respectfully,

A handwritten signature in black ink, appearing to read 'Robert Quaiff', written in a cursive style.

Robert Quaiff  
Chair, 2017, Eastern Ontario Wardens' Caucus

cc: Senior Manager, Enhancing Emergency Services in Ontario (EESO) Office  
Ontario Association of Paramedic Chiefs (OAPC)  
Association of Municipalities of Ontario (AMO)  
Eastern Ontario Wardens' Caucus (EOWC)

